

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Ohio Collocation Disconnections*

1. *Brief Description: In February 2003, TDS Metrocom discovered that SBC was inappropriately billing us for collocation products we had previously sent disconnect orders on. These disconnect orders were from as far back as December 2002.*

V. Analysis of Issue

Please answer the following questions:

1. *When this issue was first discovered?*

TDS Metrocom discovered this issue in February 2003.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy for roughly 5 months.

3. Is it a recurring problem?
It was for 5 months worth of billing cycles.

4. Your belief as to the cause of the problem.
Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS. Specifically as it relates to the process in place to validate orders are worked correctly, timely, and associated billing adjustments made.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom is not aware of any specific interpretation issues.*
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*
7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since February 2003.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?
Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since February 2003.

3. Last known position of the opposing carrier.
SBC has acknowledged the validity of our dispute claims.

4. Were any bill adjustments made to resolve this issue?
Yes, however we are still in the process of validating that 100% of the necessary charges, including LPCs have been adjusted on our invoices..

5. Were any policies or procedures changed to address this issue? If so, what changes were made?
TDS Metrocom can only assume that SBC is in the process of making changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly, including any associated LPCs.*
2. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*
(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with

statements made above, and by answering the following questions.)
TDS' issue identification above identifies this as solely an Ohio issue. There are no allegations pertaining to Wisconsin. Accordingly, this allegation should be dismissed from this docket.

A. Analysis of Issue

1. Your belief as to the cause of the problem. *N/A*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *N/A*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *N/A*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Authorized Representative: *Scott VanderSanden*

Telephone Number: *(414) 270-5920*

e-mail: *sv3456@sbc.com*

X. Further Investigative Activities *(for staff use only)*

Investigation into the Wholesale Billing Practices of
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<p>I. Purpose</p> <p><i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i></p>
<p>II. Directions</p> <ol style="list-style-type: none"> <i>1. Please complete a separate form for each issue.</i> <i>2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.</i> <i>3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.</i> <i>4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.</i>
<p>III. Submitting Carrier(s) General Information</p> <p>Submitted by: <i>TDS Metrocom</i></p> <p>Contact <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: todd.mcnally@tdsmetro.com</p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: todd.mcnally@tdsmetro.com</p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: <i>608-663-3029</i> e-mail: rod.cox@tdsmetro.com</p>
<p>IV. Issue Identification</p> <p>Name: <i>(short identifier) Outstanding Late Payment Charges (LPCs).</i></p> <ol style="list-style-type: none"> <i>Brief Description: In December 2001, TDS Metrocom discovered that SBC was inappropriately billing us for late payment charges associated with charges that had previously been adjusted.</i>
<p>V. Analysis of Issue</p> <p>Please answer the following questions:</p> <ol style="list-style-type: none"> When this issue was first discovered?

TDS Metrocom discovered this issue in December 2001.

2. How many occurrences and approximately over how long a period of time?

Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions. This specific exception has taken SBC 16 months and counting to resolve.

3. Is it a recurring problem?

Yes.

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom is not aware of any specific interpretation issues.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since January 2003.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since January 2003.

3. Last known position of the opposing carrier.

SBC has acknowledged the validity of our dispute claim, however TDS Metrocom has not received documentation showing that 100% of the required adjustments have been made to our accounts.

4. Were any bill adjustments made to resolve this issue?

Some.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom can only assume that SBC is in the process of making changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly.*
2. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with

statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

This issue appears to be the same as TDS Issue #17. SBC incorporates here its answer to that issue.

SBC does not believe this to be a substantive issue. However, if it is occurring at all, it is likely caused by a manual Service Representative error in which the Service Representative failed to manually adjust a Late Payment Charge ("LPC") appropriately.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

To a certain extent, yes.

3. What performance measures can be implemented to monitor the desired system operation? *N/A*

4. Any other pertinent information?

Aside from the terms of TDS' interconnection agreement, SBC notes the following: LPC adjustments are incorporated into the Claims Investigation Process Checklist. The specific direction given to the SBC Midwest LSC Service Representative states that, "[i]f adjustment/credit is required: (the Service Representative should) Verify if interest or Late Payment charges should be credited. (See Adjustment section)."

The Adjustment section of the "Service Representative Methods and Procedures" (M&P) further explains the process to be followed by the Service Representative: {should this be in quotes?} When the claim has been investigated and results in an adjustment, issue the adjustment. Once all items on the claim spreadsheet are resolved, the status of the claim can be changed to Resolved and Closed. A Resolution Letter will be sent identifying the amount to be adjusted. If the claimed amount is adjusted (in favor of the customer), Late Payment Charges will also be adjusted.

If TDS Metrocom has evidence that LPCs are not being properly adjusted by LSC Billing team Service Representatives, then TDS Metrocom should be escalating that evidence to the appropriate LSC Billing team manager for resolution. TDS Metrocom has access to the LSC escalation list via the CLEC Online website. That list provides the names and telephone numbers for the LSC Billing team managers up to, and including, the Vice President of Local Operations.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach

<p>any relevant accessible letter(s). <i>N/A</i></p> <p>4. Identify any other carrier(s) known to have experienced similar problems. <i>N/A</i></p> <p>5. Did you identify any other problems arising from or related to this issue? <i>N/A</i></p> <p>6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). <i>N/A</i></p> <p>7. Were any policies or procedures changed to address this issue? If so, what changes were made? <i>N/A</i></p>
<p>IX. Opposing Carrier's General Information <i>(to be completed after July 30, 2003, prehearing)</i></p>
<p>Submitted by: <i>SBC</i></p> <p>Contact : <i>James Jermain</i> Telephone Number: <i>608-252-2359</i> e-mail: <i>jj8571@sbc.com</i></p> <p>Subject Matter Expert (SME): <i>Frederick C. Christensen</i> Telephone Number: <i>(414)-319-5617</i> e-mail: <i>fc1618@sbc.com</i></p> <p>Authorized Representative: <i>Carla Rowland</i> Telephone Number: <i>214-464-7511</i> e-mail: <i>cb8043@sbc.com</i></p>
<p>X. Further Investigative Activities <i>(for staff use only)</i></p>
<p>XI. Final Disposition <i>(for staff use only)</i></p>

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IV. Issue Identification <p>Name: <i>Proactive Prevention</i></p> <ol style="list-style-type: none"> <i>1. Brief Description: Due to the numerous issues discovered within SBCs Billing OSS to date, TDS Metrocom has been attempting to avoid disputes in the future. Specifically, we have been attempting, since April 2003, to obtain written confirmation from SBC, pricing of a limited set of DS-3 products prior to ordering them. To date, we have yet to receive written confirmation from SBC exactly what the pricing would be.</i>
V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? April 2003
2. How many occurrences and approximately over how long a period of time?
Number of occurrences is not applicable to this issue. It has been ongoing for 3 months.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. TDS Metrocom can only assume that the cause for their unwillingness to commit to pricing in writing is due to the fact that they are not confident in their billing OSS.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? TDS Metrocom continues to try to work this with SBC.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? Yes. Each day that TDS Metrocom is not able to resolve this issue, we are not able to service potential customers.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes.
Numerous phone conversations and emails with SBC Account Management since April 2003.
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
Yes. Numerous phone conversations and emails with SBC Account Management since April 2003.
3. Last known position of the opposing carrier. SBC continues to avoid providing TDS Metrocom with written confirmation of pricing related to these products.
4. Were any bill adjustments made to resolve this issue? Not applicable to this measure.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has not communicated to TDS Metrocom that there is, nor are we aware of any.

VII. Relief Sought

- 1.) *(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)* SBC should be required to honor our request, as their customer, written confirmation of product pricing.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
TDS requested nine pricing scenarios on June 3, 2003. On June 12, 2003, SBC faxed TDS the nine scenarios with the pricing confirmations. On June 17, 2003, TDS submitted two more pricing scenarios for SBC to confirm. SBC's response was sent

to TDS on July 17, 2003. Between the above dates, SBC explained to TDS that all of the pricing was in its Interconnection Agreement and that SBC would not do TDS' pricing for TDS. The pricing for these services can be found in the pricing appendix of TDS' Interconnection Agreement. While pricing for these services was performed by SBC as a courtesy, SBC generally does not assume responsibility for pricing elements that are listed in a CLEC's ICA.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *N/A*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *No.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Sharmaine Summerville*

Telephone Number: *(312) 335-6724*

e-mail: *ss7419@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *(214) 858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities (for staff use only)

XI. Final Disposition (for staff use only)

182934

Investigation into the Wholesale Billing Practices of
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III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Resale Termination Liability*

1. Brief Description: *In February 1999, TDS Metrocom discovered that SBC charged us for an end users termination liability.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in February 1999.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time as we are only aware of one so far. This has affected SBCs billing accuracy as far back as 1999.

3. Is it a recurring problem?

We continue to research to see if this issue continues to happen.

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inappropriate process and procedures.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom does not feel that it does.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management since October 2002.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management since February 1999.

3. Last known position of the opposing carrier.

SBC had sustained our dispute claiming that since we ordered the customer "Assume As Is", that we also assumed the end users termination liability.

4. Were any bill adjustments made to resolve this issue?

No

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom is not aware of any changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Perform audit of SBCs current process to assure that SBC has not billed carriers for end users termination charges.*
2. *Provide results of audit to affected carriers.*
3. *Documented process of how a retail customers billing is affected when a customer converts from retail to a CLEC.*
4. *Periodic audit to identify back sliding.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
TDS ordered the customer "Assume As Is" and they were responsible for the termination liability charge of \$(redacted). SBC denied this claim on March 8, 1999. Account Management has discussed this issue with TDS on numerous billing calls, most recently in May 2003.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
Yes. Assumption "as is" means that TDS assumes the customer contract "as is," including the termination liability (if any).
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
The Account Team explained to TDS on a billing call in May 2003 that the Account Team agrees that the claim should have been sustained and TDS accepted the resolution.
2. Were any bill adjustments made to resolve this issue? *No.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

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Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Sharmaine Summerville*

Telephone Number: *(312) 335-6724*

e-mail: *ss7419@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *(214) 858-0700*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Residential/Business Misclassification*

Brief Description: *In October 2002, TDS Metrocom discovered that SBC was taking residential orders and coding them as business in their systems. Not until roughly 7 months after we brought this to SBCs attention did they finally started making adjustments to our invoices and sent out Accessible Letter CLECAM03-197 to alert other affected carriers. Issues due to this misclassification include, but not limited to;*

- 1. Data integrity issues within SBCs records.*
- 2. SBC was billing us at inaccurate rates.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in October 2002.

2. How many occurrences and approximately over how long a period of time?

Approximately 16k loops. Accordingly to SBCs Accessible Letter, this was a recurring problem for approximately 9 months (April 20, 2002 until November 9, 2002).

3. Is it a recurring problem? *Yes it continues with our current invoices.*

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS and inaccurate rate table information.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom does not feel that it does.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue (Please do not re-argue your case here or submit supporting documents.)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management since October 2002.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management since October 2002.

3. Last known position of the opposing carrier.

SBC acknowledged the validity of our claim.

4. Were any bill adjustments made to resolve this issue?

Yes, although additional adjustments are required due to the fact that it continues to occur..

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom does not believe that there have been changes made due to the fact that the problem continues to occur.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Perform an audit to assure that all exceptions are indeed identified.*
2. *Periodic audit to identify back sliding.*
3. *Audit to validate that all appropriate adjustments to billing have been made..*
4. *Documented process how circuits are entered into the SBC systems, billed and audited in case of a dispute.*

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

This problem was the result of an error made in the April 2002 software upgrade to MOR. Requests for new stand-alone 2-wire analog residential loops were incorrectly classified as business loops. The error was discovered during testing of the SBC Midwest November 2002 OSS Release. The coding logic that caused the error was corrected with the implementation of the November software upgrade release, but it could not correct the embedded base of loops that had been ordered between April 20 and November 9, 2002.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*

4. Any other pertinent information?

In order to correct the billing for the misclassified loops, SBC Midwest created a utility in May that would mechanically generate service orders to change the loop classification from business to residential on a going-forward basis and ran that utility in late May and early June. With respect to prior billing, adjustments were generated from the service orders created by a utility back to the date the loop was originally established. These adjustments appeared in the Other Charges and Credits section of the CLECs' CABS bills, and were identified by the words "LOOP MRGR BLG". With respect to the affected loops that were no longer in service, SBC Midwest calculated manual adjustments to the CLECs, and those adjustments have also been completed. SBC Midwest also retained E&Y to perform an extensive verification that the classification errors identified above have been corrected and that billing credits related to this issue have been properly calculated and applied to the affected CLECs' accounts.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
See above.
2. Were any bill adjustments made to resolve this issue?
See above response in A4.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).



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Via an Accessible Letter

4. Identify any other carrier(s) known to have experienced similar problems.
COVAD COMMUNICATIONS
INTRA COMMUNITY COMM
NORTHERN TELEPHONE & DATA
OVATIONS COMMUNICATIONS INC
RHYTHMS LINKS INC
TDS TELECOM
US XCHANGE OF WISCONSIN LLC
WEST WISCONSIN COMMUNICATION SYSTEMS
NORTHERN TELEPHONE & DATA
OVATIONS COMMUNICATIONS INC
TDS TELECOM
5. Did you identify any other problems arising from or related to this issue?
No.
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
There were no other issues tied to this one.
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
No, other than as noted above.

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *James Jermain*
 Telephone Number: *608-252-2359*
 e-mail:

Subject Matter Expert (SME): *Vicki McDonald*
 Telephone Number: *(314)-331-2670*
 e-mail:

Authorized Representative: *Carla Rowland*
 Telephone Number: *214-464-7511*
 e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

<p>I. Purpose</p> <p><i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i></p>
<p>II. Directions</p> <ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
<p>III. Submitting Carrier(s) General Information</p> <p>Submitted by: <i>TDS Metrocom</i></p> <p>Contact <i>Todd McNally</i> Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: 608-663-3029 e-mail: rod.cox@tdsmetro.com</p>
<p>IV. Issue Identification</p> <p>Name: <i>(short identifier) Residential Discount</i> Brief Description: <i>TDS Metrocom is not consistently getting the residential discount monthly recurring charge (MRC) on all residential circuits.</i></p>
<p>V. Analysis of Issue</p> <p>Please answer the following questions:</p>

1. When this issue was first discovered?

TDS Metrocom discovered this issue in September 2002.

2. How many occurrences and approximately over how long a period of time?

TDS Metrocom continues to discover exceptions, however has seen thousands to date.

Exceptions data as far back as April 2001.

3. Is it a recurring problem? *Yes*

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom does not feel that it does.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed since October 2002.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed since October 2002.

3. Last known position of the opposing carrier.

SBC has yet to provide us a response to any of our dispute claims filed as far back as October 2002.

4. Were any bill adjustments made to resolve this issue?

No.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom is not aware of, nor has SBC made us aware of, any changes that would address this issue.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Perform an audit to capture all residential circuits that are, or have been, charged the inaccurate MRC rate.*

2. *Issue appropriate billing adjustments required to address #1 above.*

3. *Correct necessary billing OSS to assure future billing is accurate.*
4. *Periodic audit to identify back sliding.*
5. *Documented process how residential discount MRC rates are applied tot he appropriate residential circuits.*

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
This issue has been submitted on a claim to SBC Midwest LSC. TDS is one of the volunteer CLECs participating in a claims trial being conducted for the CLEC User Forum Billing Subcommittee. In this trial, claims do not require detail level information at the BTN level; instead, claims are handled at an issue level including the frequency of alleged billing error. The claims trial was set up to determine if CLEC claims for certain rate-related complaints could be accepted by SBC Midwest LSC at the issue level. The claims trial is currently underway and no conclusions have been reached; the investigation of this particular TDS claim is not complete. (See no. 4 below for additional information.)
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
No.
3. What performance measures can be implemented to monitor the desired system operation?
N/A
4. Any other pertinent information?
This issue was brought before the CLEC User Forum Billing Subcommittee and a readout on the progress of the claims trial is scheduled for its next meeting, Sept. 18, 2003.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
See above.
2. Were any bill adjustments made to resolve this issue?
None at this time. See A 1 above.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems.
N/A
5. Did you identify any other problems arising from or related to this issue?
Not at this time.
6. What steps, if any, did you take to proactively identify other billing issues arising

<p>from or related to this issue? Please attach any relevant accessible letter(s). <i>N/A</i></p> <p>7. Were any policies or procedures changed to address this issue? If so, what changes were made? <i>N/A</i></p>
<p>IX. Opposing Carrier's General Information <i>(to be completed after July 30, 2003, prehearing)</i></p>
<p>Submitted by: <i>SBC</i></p> <p>Contact <i>James Jermain</i> Telephone Number: <i>(608)-252-2800</i> e-mail: <i>jj8571@sbc.com</i></p> <p>Subject Matter Expert (SME): <i>Margaret Lade</i> Telephone Number: <i>414-319-5661</i> e-mail: <i>ml3762@sbc.com</i></p> <p>Authorized Representative: <i>Carla Rowland</i> Telephone Number: <i>(214)-464-7511</i> e-mail: <i>cb8043@sbc.com</i></p>
<p>X. Further Investigative Activities <i>(for staff use only)</i></p>
<p>XI. Final Disposition <i>(for staff use only)</i></p>

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Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>TDS Metrocom</i> Contact <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: <i>todd.mcnally@tdsmetro.com</i></p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: <i>608-441-7959</i> e-mail: <i>todd.mcnally@tdsmetro.com</i></p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: <i>608-663-3029</i> e-mail: <i>rod.cox@tdsmetro.com</i></p>
IV. Issue Identification
<p>Name: <i>Inclusion of Billing Sub Team Forum Issues.</i></p> <p>Brief Description: <i>TDS Metrocom believes that the issues completed to date, under investigation and future issues need to be incorporated into this Docket proceeding.</i></p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? <i>Not applicable to this issue.</i> 2. How many occurrences and approximately over how long a period of time? <i>Not applicable to this issue.</i>

3. Is it a recurring problem? Not applicable to this issue.
4. Your belief as to the cause of the problem. Not applicable to this issue.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? Not applicable to this issue.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Not applicable to this issue.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Not applicable to this issue.
3. Last known position of the opposing carrier. Not applicable to this issue.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? Not applicable to this issue.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *TDS Metrocom requests that the Billing Sub Team collaborative process and its work to date, and work to be completed in the future, be included into this proceeding.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

This is by no means a billing "issue." TDS Metrocom appears to be interested in raising issues in multiple venues. SBC does not believe this is an efficient means of addressing the issues. As SBC will document in its September 1, 2003 Billing Auditability Plan report, the CLEC User Forum Billing Subcommittee is addressing issues raised by the CLEC community. SBC believes the PSCW did not intend for this proceeding to replace the Billing Subcommittee. Since the PSCW is informed regularly of the progress made by this body, SBC believes the PSCW should refrain from incorporating Billing Subcommittee issues already addressed or destined for the Billing Subcommittee into the 6720-TI-183 proceeding. Similarly, SBC suggests that the Administrative Law Judge schedule a pre-hearing conference – at the earliest opportunity – to remove issues from this proceeding that are not properly addressed here (e.g., because the issue is being addressed in another venue or jurisdiction or because it does not pertain to Wisconsin).

A. Analysis of Issue

1. Your belief as to the cause of the problem. *N/A*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *N/A*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *N/A*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*Submitted by: *SBC*Contact: *Jim Jermain*Telephone Number: *(608) 252-2359*e-mail: *jj8571@sbc.com*Subject Matter Expert (SME): *Jim Jermain*Telephone Number: *(608) 252-2359*e-mail: *jj8571@sbc.com*Authorized Representative: *Scott VanderSanden*Telephone Number: *(414) 270-5920*e-mail: *sv3456@sbc.com***X. Further Investigative Activities** *(for staff use only)***XI. Final Disposition** *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*
Contact *Todd McNally*
Telephone Number: 608-441-7959
e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*
Telephone Number: 608-441-7959
e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*
Telephone Number: 608-663-3029
e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: Reactive efforts by TDS as opposed to proactive efforts by SBC.

Brief Description: TDS Metrocom has spent countless resources making improvements to SBCs Billing OSS as opposed to SBC, as the vendor, proactively providing adequate service. Examples include:

1. TDS Metrocom auditing and identifying exceptions to SBCs invoices (incorrect rates, double billing, etc).
2. Managing and escalating the progress of dispute claims submitted.
3. Identifying gaps in current performance measurements related to billing.
4. Identifying areas for improvements in billing dispute claim process.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? Ever since TDS Metrocom first started purchasing products from SBC.
2. How many occurrences and approximately over how long a period of time? Not applicable to this issue.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that the cause is due to SBCs monopolistic view of placing the burden on CLECs both financially as well as process.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? TDS Metrocom does not believe that there is.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. Informally with SBC Account Management through out the term of our interconnection agreement.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. Informally with SBC Account Management through out the term of our interconnection agreement.
3. Last known position of the opposing carrier. SBC has repeatedly claimed formally that issues TDS Metrocom has raised as they relate to billing have either been single one-time occurrences, or exceptions due to underlying operational gaps as opposed to inefficiencies in their billing OSS.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? Not applicable to this issue.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *Audit of SBCs current process to assure that 100% of exceptions are corrected and invoices adjusted accordingly.*
- 2.) *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

TDS' assertions do not state an "issue" as much as TDS' view of the world. Nevertheless SBC takes this opportunity to state its belief as to how specific concrete billing issues can and should be resolved. SBC believes most real billing issues involve a situation that should be resolved between the two entities through the normal business-to-business relationship.

Auditing bills is a necessary part of any business relationship. As in any billing situation, it is the responsibility of both parties involved to insure that the proper information is conveyed upon the bill. Even though SBC strives for perfection, it realizes that a "perfect" billing system is not attainable. However, SBC has taken the necessary steps to create, maintain and approve upon a comprehensive bill audit process. As is the case with any business process, SBC listens to the concerns of its customers and attempts to improve those areas where improvement is warranted.

Billing claims are necessary, thus, a process to manage the progress of these claims is also necessary. While the LSC strives for perfection, it is inevitable that mistakes in resolving claims will occur. In these instances it may be necessary to escalate to correct these mistakes.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *N/A*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?

The LSC is a participant in the billing subcommittee of the CLEC User Forum. This is a forum that was specifically designed to allow the CLECs an opportunity to have input into billing process, including those related to claims. The Forum is an opportunity for CLECs to provide feedback directly to the billing process owners on the items that are most important to them.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *N/A*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what

changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *(214) 464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Trouble Isolation Charges (TIC)*

Brief Description: *"TIC" type charges are charges assessed by SBC to CLECs when SBC field technicians code trouble tickets indicating that they were not able to isolate the trouble to SBCs side of the network. These type of charges generally are assessed using three different USOCs that we are aware of; VRP, MVV and ALK. MVV and ALK are time and material type charges and VRP is a trouble isolation type charge.*

TDS Metrocom has identified several issues as it relates to SBCs billing of "TIC" type of

activity including, but not limited to:

- *Incorrect rates*
- *Inappropriate charges (i.e. charged when we should not have been)*
- *Double billing*
- *Incomplete billing*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered various issues with "TIC" billing in April 2002.

2. How many occurrences and approximately over how long a period of time?

TDS Metrocom continues to discover exceptions, however has seen thousands to date. Exceptions data as far back as 1999.

3. Is it a recurring problem? *Yes*

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that there are multiple causes for this problem, including but not limited to:

- 1) *Integrity concern. Specifically technicians controlling the assessment of "TIC" charges by the way they code their tickets. (i.e. It appears that charges are assessed even if the source of the customers trouble was not isolated)*
- 2) *SBCs billing OSS is currently not able to provide, on their invoice, the date the work was completed that caused the charge when assessing the trouble isolation charge (VRP USOC) which prevents us from being able to easily validate the charge*
 5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom does not feel that it does.*
 6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*
 7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue (Please do not re-argue your case here or submit supporting documents.)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management.

3. Last known position of the opposing carrier.

SBC has recognized in the past that "TIC" charges assessed were invalid.

4. Were any bill adjustments made to resolve this issue?

Yes.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom is not aware of, nor has SBC made us aware of, any changes that would address each of the concerns we have with the billing of TIC.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture

such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

- 1. Rate table audit to assure that rates for "TIC" type USOCs are accurate.*
- 2. Improvements made to SBCs billing OSS to populate the date that the work was completed that constituted the charge.*
- 3. Periodic audit to capture double billing.*
- 4. Documented process how "TIC" type charges are determined, validated, billed and finally, audited in case of a billing dispute.*
- 5. Provide a documented comparison of wholesale process compared to retail process for #4 above.*

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

- 1. Your belief as to the cause of the problem.*
TDS originally raised the issue of incorrect billing of TIC charges in August 2002 at the Regional CLEC User Forum. In response to the issue that was raised, SBC began an investigation of examples and situations provided by TDS, which resulted in several process improvements, system enhancements and additional training within the LOC to ensure the proper application of CLEC TIC charges. SBC and TDS also negotiated a settlement, the terms of which are confidential. As a result of TDS raising the issue at the User Forum and SBC's subsequent actions/steps, any inadvertent billing of CLEC trouble tickets has now been addressed. The issue at the User Forum was closed at the April 2003 User Forum.
- 2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.*
Tariffed rates for trouble isolation apply.
- 3. What performance measures can be implemented to monitor the desired system operation? N/A*
- 4. Any other pertinent information?*
SBC strongly denies—and finds extremely offensive—the allegation that its employees knowingly alter the coding of trouble tickets in order to shift trouble resolution results to the CLECs' shoulders.

Under SBC's corporate policies, an employee's intentional misrepresentation of the trouble resolution code would be grounds for disciplinary action.. The LSC/LOC Operations management team would not hesitate to discipline an employee who intentionally misrepresents the facts that we rely upon to manage our business. That kind of behavior is simply not tolerated.

The PSCW should strongly encourage TDS Metrocom to share any evidence it has regarding the purported miscoding of trouble isolation codes with the

appropriate SBC Management team representative so that the allegation can be thoroughly investigated and either confirmed or denied.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
TDS and SBC signed a settlement agreement regarding TIC earlier this year. This settlement is proprietary and cannot be discussed.
2. Were any bill adjustments made to resolve this issue?
See above.
3. How were the adjustments communicated to the submitting carrier?
Please attach any relevant accessible letter(s). N/A
4. Identify any other carrier(s) known to have experienced similar problems.
N/A
5. Did you identify any other problems arising from or related to this issue?
N/A
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Peggy Beata*

Telephone Number: *(312) 335-7340*

e-mail: *tr5972@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *(214) 858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

- 1. Please complete a separate form for each issue.*
- 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
- 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
- 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Toll Free Database Query*

Brief Description: *Charges are assessed to TDS Metrocom for the look up of terminating telephone numbers associated with toll free numbers. Charges are assessed at a switch/point code level. In October 2002, we received the first invoice from SBC for this activity. Issues we discovered with this invoice include, but not limited to;*

- 1. Invoice contained 12 months worth of back billing.*
- 2. SBC was billing us for activity that did not belong to us. Of the 19 point codes that SBC was billing us for, only 8 of them were actually ours. The other 9 belonged to*

other companies, yet SBC was billing us for them.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in October 2002.

2. How many occurrences and approximately over how long a period of time?

Thousands. This was a problem affected approximately 17 months worth of billing before it was finally corrected on our March 2003 invoice.

3. Is it a recurring problem? *Not since February 2003.*

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS and inaccurate rate table information.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom does not feel that it does.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue (Please do not re-argue your case here or submit supporting documents.)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed as far back as October 2002.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed as far back as October 2002.

3. Last known position of the opposing carrier.

SBC acknowledged the validity of our dispute claim and made the appropriate changes to their billing OSS.

4. Were any bill adjustments made to resolve this issue?

Yes.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom assumes that SBC made some changes to their billing OSS to correct this issue.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Perform an audit to assure that all exceptions are indeed identified.*
2. *Periodic audit to identify back sliding.*
3. *Audit to validate volume activity.*
4. *Documented process how Toll Free database query activity is validated, charges are assessed and audited in case of a dispute.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue**1. Your belief as to the cause of the problem.**

As part of an error correction project, service representatives in the LSC were instructed to identify and build point codes to a company bill so that usage could be appropriately routed for billing to the proper company. The Service Representative started by going to the Telcordia website and identifying 18 point codes that were listed as belonging to TDS Telecom. Although all 18 point codes were identified as belonging to TDS Telecom, they were all built on a TDS Metrocom Bill along with one additional point code that did not belong to TDS Telecom. This accounts for the 19 total point codes that are referred to in TDS testimony.

There are two issues here and each will be addressed individually. (1) The 19th point code was a service representative error and was added to the TDS account. It was later discovered by the representative and removed. This error only affected the October 2002 bill. Even though the point code was removed from the TDS bill, usage that was associated with this point code was routed to the erroneous point code for the days that the point code was assigned to the TDS bill. This issue was identified and resolved and the credit for the invalid usage was issued as of February 5, 2003. (2) When TDS received the bill for the remaining 18 point codes, it initially refused to pay any of the bill, as it was under the impression that it should not be receiving any SS7 bills from SBC. Upon further investigation from the error correction service representative, it was determined that 8 of the point codes did belong to TDS Metrocom and 10 point codes and the associated usage have been billed to TDS Telecom. The remaining 8 point codes that correctly belong to TDS Metrocom are being billed to that company.

- 2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** *No.*
- 3. What performance measures can be implemented to monitor the desired system operation?** *N/A*
- 4. Any other pertinent information?**

Ultimately, to prevent this from happening again, TDS should notify Telcordia to update its records to identify which company owns which point code and/or send SBC ASRs to rehome the point codes to the proper company to accomplish the same record update. As of now, this is no longer an issue. Indeed, as TDS acknowledges, this has not been a problem since February 2003.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above; according to TDS, this is not an issue.*
2. Were any bill adjustments made to resolve this issue? *Yes.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
The adjustments were communicated via the SBC service representative with a detail billing resolution. Credit for the invalid usage was issued as of February 5, 2003.
4. Identify any other carrier(s) known to have experienced similar problems.
Unknown.
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
Ultimately, to prevent this from happening again, TDS should notify Telcordia to update its records to identify which company owns which point code and/or send SBC ASRs to rehome the point codes to the proper company to accomplish the same record update. As of now, this is no longer an issue. Indeed, as TDS acknowledges, this has not been a problem since February 2003.

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*